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# **ATTACHMENT 15**

American Civil Constructors West Coast, Inc. Response to Supplemental 104(e) Request (January 29, 2010) Lower Duwamish Waterway Superfund Site



# **Interim Stockpile Sampling Report**

Point Ruston Concrete Recycling Project Ruston, Washington

January 7, 2009

Prepared For:

Nuprecon LP 35131 SE Center Street Snoqualmie, WA 98065

Prepared E

Environmental Management Services, LLC

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Licensed Site Assessor Registered Geologist / Hydrogeologist Steplen M. Spencer Principal



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December 17<sup>th</sup> Sampling December 22<sup>nd</sup> Sampling December 23<sup>rd</sup> Sampling



#### Introduction

Environmental Management Services (EMS) has prepared this Interim Stockpile Sampling Report at the request of Nuprecon LP (Nuprecon) following the sampling of processed recycled concrete located at Point Ruston, Washington.

This report will discuss sampling activities, methodology and findings related to the collection and chemical analysis of concrete samples collected on three separate sampling events during December 2008 sampling requirements were stipulated in the Nuprecon memorandum of understanding (MOU) between Point Ruston LLC (property owner) and Nuprecon LLP (contractor). Sample requirements include the collection and chemical analysis of one (1) four way composite sample of "post crushed" concrete from every 2,500 cubic yards of processed concrete material. Chemical analysis was to include total petroleum hydrocarbons, total metals lead and arsenic and poly chlorinated byphenols (FCC)s.

### Site History

The land is the former site of a smelting tacility operated by Asarco from 1912 to 1985. An agreement was entered into between the United States Environmental Protection Agency (EPA), Asarco and Point Ruston Lico The agreement allowed Asarco to sell the Asarco Smelter property, which is part of the Commencement Bay Nearshore/Tideflats Superfund Site, to Lacey, Washington based developer Point Ruston LLC (Point Ruston). Point Ruston intends to undertake residential and commercial development on the purchased property.

### Processing Operations

EMS understands that the processing operation includes the barge import of concrete debris from the pier bravo project (#356 CVN Maintenance Pier Replacement) Bremerton Naval Shipyard. Each barge load contains approximately 2000 cubic yards of concrete debris. The barge takes approximately 4 to 6 hour to reach the offload site at Point Ruston following loading at the source location. The barge is unloaded once arriving at the Point Ruston processing facility by Nuprecon. The concrete is stockpiled near the crushing equipment and all accessible rebar cut away prior to crushing. Crushing is accomplished by loading the large concrete debris into a Komatsu 580G crusher followed by stockpiling crushed material in 500 yards stockpiles.

### Sampling & Analytical Activities

The sampling and analysis plan (SAP) completed by EMS was based on the MOU between Nuprecon and Point Ruston LLC. The SAP provided specific allowable limits for total petroleum hydrocarbons, total metals arsenic and lead and PCBs. These allowable limits were prescribed in the MOU.

#### Allowable limits:

Total Petroleum Hydrocarbons Total Metals – Arsenic Total Metals – Lead Polychlorinated Byphenols

# 200 mg/kg 20 mg/kg 250 mg/kg 1 mg/kg

# December 17, 2008 Sampling Event

Following the processing of approximately 1509 cubic yards of concrete, EMS Sr. Geologist, Robin Hamlet and Principal, Stephen Spencer completed a site reconnaissance of the Point Ruston concrete processing area. One stockpile totaling approximately 500 cubic yards was presented to EMS as the most recent stockpile following concrete processing activities. Mr. Joe Fuchs, Nuprecon Site Superintendent provided site specific information as to the concrete staging, processing and stockpile operations prior to EMS sampling activities.

During this site visit, samples were collected from five random locations around the perimeter of the stockpile approximately 6 to 10 inches below the surface of the stockpile. Sample material consisted of a mix of concrete dust and small concrete granules up to 1 to 2 inch concrete rubble, and 1 inch angular gravel aggregate. Sample material was collected using properly decontaminated stainless steel sampling trawl and disposable Nitrile gloves. Sample material was placed into discrete sample collection jars and assigned unique sample identification numbers. Following collection, the samples were transported to Fremont Analytical under industry standard chain of custody for chemical analysis.

Each discrete sample was consolidated by the laboratory and analyzed as one composite sample designated S1-S5-Composite. Sample analysis included total arsenic & lead by method EPA Method 6020, total petroleum hydrocarbons by Method NWTPH-HCID, and PCBs by EPA Method 8082 (Attachment A).

Interim Stockpile Sampling Report Point Ruston Concrete Recycling Project Ruston, Washington

Sample results reported PCBs non-detect (ND) or below the laboratories method reporting limit (MDL) and total petroleum hydrocarbons below there respective MDL. Total lead was reported at 25 milligrams per kilogram (mg/kg) and total arsenic at 40 mg/kg. Arsenic was the only analyte reported exceeding their respective maximum allowable concentration.

### December 19, 2008 Sampling Event

Due to the elevated levels of arsenic reported in the December 17, 2008 sampling event, Nuprecon directed EMS to collect additional samples of post processed concrete. EMS Sr, Environmental Geologist Robin Hamlet collected four disperie samples from four random locations around the perimeter of the stockpile approximately 6 to 10 inches below the surface of the stockpile. As with the previous sampling event, sample material consisted of a mix of 1-inch minus concrete and angular gravel aggregate. Sample material was collected using properly a decontaminated stainless steel sampling trawl and disposable Nitrile gloves. Sample material was placed into discrete sample collection pars and assigned unique sample identification numbers. The samples were transported to Fremont Analytical under industry standard chain of custody for chemical analysis.

Each discrete sample S2, S2A, S2B, and S2C was consolidated by the laboratory and analyzed as one composite sample designated S2-Composite. This sample was analyzed for total arsenic by EPA Method 6020 only (Attachment A). Sample results reported total arsenic at 50 mg/kg. Sample results are presented in Attachment A.

#### December 23, 2008 Sampling Event

Based on the sample results from both the December 17 and 19, 2008 sampling events, further investigation as to the nature of the arsenic was warranted. EMS was authorized by Nuprecon to further investigate the concrete; both staged on the site prior to processing and the post processing stockpiled material.

On December 23, 2008, EMS completed a site reconnaissance with the assistance of Joe Fuchs, Nuprecon Site Superintendent. EMS was shown three areas, a pre-processing concrete staging area, the concrete processing area and the post processing stockpile area.

Interim Stockpile Sampling Report Point Ruston Concrete Recycling Project Ruston, Washington

#### **Pre-Processing Sample Collection**

Pre-processed concrete samples were collected by two different methods. The first method was to collect one four-way composite sample of small concrete debris within the staging stockpile. The second method was the collection of bulk mass concrete for offsite crushing and analysis in a controlled environment.

Unlike the previous sampling events, the four-way sample was composited in the field by placing equal amount of material, approximately four ounces from each of the four locations, in a one gallon sample collection bag. Once homogenized, a four ounce sample (C2-Pre-122308) was collected from the material using a stainless steel sampling spoon and Nitril gloves. The sample material was placed in to a laboratory provided four ounce sample jar.

Two separate bulk mass samples were collected. One consisted on a light colored concrete referred to as Decking, sample identification S6-Decking. The second sample was of a darker gray to black concrete referred to as piling, sample identification S5-Piling. Per Nuprecon, the "Decking" originated from Pier Bravo Decking originated from Pier Bravo pilings.

Each of the bulk mass samples were placed into individual one gallon plastic bags and transported to the EMS office. The bulk material was crushed on a properly decontaminated stainless steel plate using a properly decontaminated stainless steel rock hammer. The crushed material was returned to one gallon plastic bag then four ounces collected and placed into discrete four ounces sample collection jars.

### Post-Processing Sample Collection

Four discrete samples from tour random locations around the perimeter of the post-processing stockpile were collected approximately 6 to 10 inches below the surface of the stockpile. The four-way sample was composited in the field by placing equal amount of material, approximately four ounces from each of the four locations, in a one gallon sample collection bag. Once homogenized, a four ounce sample C1-Post-122308 was collected from the material using a stainless steel sampling spoon and Nitril gloves. The sample material was placed into a laboratory provided four ounce sample jar.

Following sample collection of both the pre and post processing materials, the samples were transported to Fremont Analytical (Fremont) under industry standard chain of custody for

chemical analysis. Pre and Post composite split samples were collected and submitted to Friedman and Bruya, Inc. (F&BI) for additional duplicate analysis.

Sample results for the pre-composite sample were reported by Fremont at 43 mg/kg and F&Bl at 12.5 mg/kg. Sample results for the post-composite sample were reported by Fremont at 20 mg/kg and F&Bl at 40.1 mg/kg.

Sample results for the bulk material crushed by EMS reported sample S5-Piling containing arsenic at 5.9 mg/kg and sample S6-Decking containing arsenic at 5.9 mg/kg.

# Findings and Opinion

Due to the Point Ruston Site history extreme caution was taken to eliminate the possibility of cross contamination during the sampling process. EMS was onsite on three different dates to collect composite samples from three individual stockpiles. Each composite sample consisted of four or five discrete samples for a total of three composite samples of post-crushed concrete. Each sample was reported at or exceeding the maximum allowable limit of 20 mg/kg total arsenic. Sample results from material designated "decking", sample S5 was reported at 55 mg/kg exceeding the 20 mg/kg total arsenic.

At the request of Nuprecon, additional analysis of the most recent composite samples, C1-Post and C2-Pre, are being analyzed using Elame Atomic Absorption (FAA). Sample results were not available during the completion of this interim report, however results are anticipated to be consistent with previous analytical findings.

Based on sample results, it appears that the concrete imported to the site for processing is contaminated with arsenic at concentrations exceeding the 20 mg/kg allowable limit. Further assessment of stockpiled pre-processed concrete, post-processed concrete as well as concrete with remains in pace at the Bremerton site is warranted.

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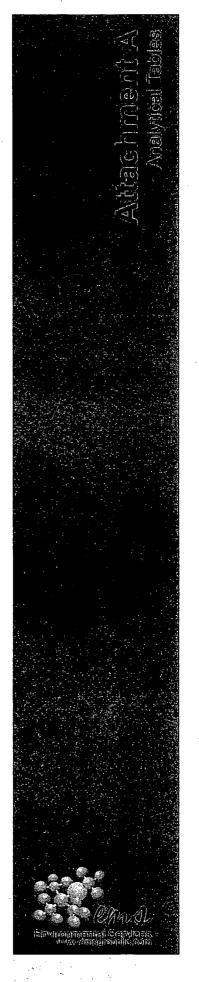
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# **Attachment A**

**Analytical Tables** 

Table 1 - Total Metals Arsenic & Lead Table 2 - Total Petroleum Hydrocarbons Table 3 - Polychlorinated Biphenyls







# Table 1 - Total Petroleum Hydrocarbons - HCID Scan **Point Ruston Concrete Recycling Project** Point Ruston, Washington

Client: Nuprecon LP

		· · · · · · · · · · · · · · · · · · ·		Onom:	Tapicoon						
,	mar and a	Sample	ingger vertice	Field Screening	ng Results	<u>т</u>	otal Petyroleu	ım Hydrocarb	ons - Method	NWTPH-HCI	D
Sample Number	Sample Location	Depth	Sample Date	Headspace	Sheen Test	Gasoline	Mineral Spirts	Kerosene	Diesel	Mineral Oil	Heavy Oil
		feet bgs	· · · · · · · · · · · · · · · · · · ·	ppm		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
S1-S5 Composit	Stockpile 01	·· NA	12/17/2008	0 ppm	None	<20	<30	<50	<50	<100	<100
<u> </u>	Labo	oratory Dete	ection or Practic	al Quantitation	Limit Soil	20.0	. 30.0	50.0	50.0	100.0	100.0
4.1	Model Toxic Cor	ntrol Act (M	TCA) Method A	Cleanup Leve	IS FOR SOIL	100/30	100/30	2000	2000	4000	2000

BOLD/RED = Analyte above MTCA 2001 Method A Cleanup levels.

Values are reported in milligrams per kilograms (mg/kg).

< # (ND) = analyte not detected above the analytical method detection limit cited.

Diesel / Mineral Oil / Oil analytical method NWTPH-Dx

Diesel / Militeral Oil / Oil analytical method A Cleanup Levels for soil are 2000 markg unless blesel & Oil 4000 mg/kg Mineral Oil
Gasoline range petroleum hydrocarbon Method A Cleanup Levels for soil are 100 mg/kg unless Benzene is present then 30 mg/kg cleanup levels
MTCA 2001 Method A Cleanup Levels for Soil from the Model Toxics Control Act (MTCA) artiendment Table 740-1 WAC 173-340 -900 Tables.

bas=below ground surface

NA=Not Applicable



Table 1 - Arsenic & Lead Metals Analysis
Point Ruston Concrete Recycling Project
Point Ruston, Washington

	· ·		the state of the s			•
<u> </u>	1.75 - Communica interest		Cleint.	Nuprecon LP		January 6, 200
				,	EPA Met	hod 6020
Sample Number	Sample Location	Laboratory	Sample Depth	Sample Date	Pb - Total Lead	As - Total Arsenic
					mg/kg	mg/kg
S1-S5-Composit	Concrete Stockpile	Fremont Analytical	AN W	12/17/2008	25	<u>40.0</u>
S1-S5-Composit (D)	Concrete Stockpile	Fremont Analytical	NA .	12/17/2008	16	<u>26.0</u>
S2-S2C-Compopsit	Concrete Stockpile	<sup>,</sup> Fremont Analytical		12/19/2008	. <b>NA</b>	<u>50.0</u>
S2-S2C-Compopsit (D)	Concrete Stockpile	Fremont Analytical	NA	12/19/2008	NA	<u>47.0</u>
S5-Decking	Concrete Stockpile	Fremont Analytical	N.	12/23/2008	NA	<u>55.0</u>
S6-Piling	Concrete Stockpile	Fremont Analytical	NA	12/23/2008	NA	5.9
C1-Post	Concrete Stockpile	Fremont Analytical	NA	12/23/2008	NA	20.0
C2-Pre	Concrete Stockpile	Fremont Analytical	NA.	12/23/2008	NA Two.	<u>43.0</u>
S5-Decking (D)	Concrete Stockpile	Fremont Analytical	NA	12/23/2008	NA	46.0
D-C1-Post	Concrete Stockpile	Freidmon & Bruya	NA 😭	12/23/2008	NA	40.1
D-C2-Pre	Concrete Stockpile	Freidmon & Bruya	NA	12/23/2008	NA NA	12.5
		Laboratory Detection of	or Practical Quar	titation Limit Soil	1	0.1
	, styles see Model	Toxic Control Act (MTCA) M	lethod A Cleanu	p Levels For Soil	250	20

BOLD/Underlined = Analyte above MTCA 2001 Method A Cleanup levels.

Values are reported in milligrams per kilograms (mg/kg).

MTCA 2001 Method A Cleanup Levels for Unrestricted Residential Land Use - (MTCA) WAC 173-340-900 Tables.

bgs=below ground surface

NA=Not Applicable

D=Laboratory Duplicate

<sup>&</sup>lt;# (ND) = analyte not detected above the analytical method detection limit cited.</p>



# Table 3 - Polychlorinated Biphenyls Analysis **Point Ruston Concrete Recycling Project** Point Ruston, Washington

	Client:	Nuprecon LP			٠. ٠.					٠.	January	6, 2008
•					Pol	ychlorina	ated bipl	nenyls (f	PCBs) M	ethod 8	082	
Sample Number	Sample Location	Sample Depth	Sample Date	Eg/kg	Aroclor 1232	a کاکا Aroclor 1016	Aroclor 1242	B Sy Aroclor 1248	g Sy Aroclor 1254	a کې Aroclor1260	Aroclor 1262	mg/span Aroctors
S1-S4-Composit	Concrete Stockpile		12/17/2008		<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	NA
	Method Reporting	or Practical Qua	ntitation Limit - Soil	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	_
	Model Toxic Control Act (MT	CA) Method A C	leanup Levels - Soil				<1 mg/k	g total A	rochlors			`.

BOLD/RED = Analyte above MTCA 2001 Method A Cleanup levels.

D= Detect exceeding HCID detection levels

Values are reported in milligrams per kilograms (mg/kg).

< # (ND) = analyte not detected above the analytical method detection limit cited.</p>

Diesel / Mineral Oil / Oil analytical method NWTPH-Dx

Diesel range petroleum hydrocarbon Method A Cleanup Levels for soil are 2000 mg/kg unless Diesel & Oil 4000 mg/kg Mineral Oil Casoline range petroleum hydrocarbon Method A Cleanup Levels for soil are 100 mg/kg unless Benzene is present then 30 mg/kg cleanup levels MTCA 2001 Method A Cleanup Levels for Soil from the Model Toxics Control Act (MTCA) amendment Table 740-1 WAC 173-340 -900 Tables.

bgs≃below ground surface

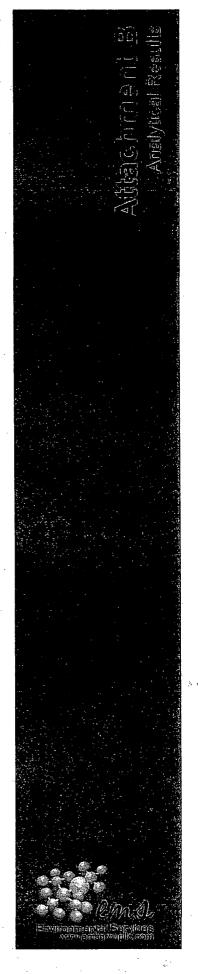
NA≈Not Applicable

# **Attachment B**

Project Analytical Results

December 17th Sampling December 22nd Sampling December 23rd Sampling







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Environmental Management Services, LLC Attn: Kaitlyn Allegretti
PO Box 153
652 8th Ave.
Fox Island, WA 98333

RE: Nuprecon - Point Ruston Concrete SP Fremont Project-No: CHM081217-1

December 18th, 2008

#### Kaitlyn:

Enclosed are the analytical results for the *Nuprecon - Point Ruston Concrete SP* soil samples delivered to Fremont Analytical on December 15th, 2008.

The samples were received in good condition - property sealed, labeled and within holding time. The samples were contained in 4oz soil jars: The samples were composited, extracted, analyzed and stored in a refrigeration unit at the USERA-recommended temperature of 4°C ± 2°C.

Examination of these samples was conducted for the presence of the following:

- Diesel and Heavy Oil in Soil by NWTPH-Dx / Dx Ext (Composite)
- Total Metals (Pb. As) in Soil by EPA Method 6020 (Composite)

This application was performed under Washington State Department of Ecology accreditation parameters. All appropriate Quality Assurance / Quality Control method parameters have been applied.

**Notations – EPA Method 6020:** The relative % difference between the sample and sample duplicate exceeded laboratory limits. The laboratory control sample (LCS), Matrix Spike (MS) and MS Duplicate were within range demonstrating that the analysis was control. The variance is due to the sample composite.

Please contact the laboratory if you should have any questions about the report.

Thank you for using Fremont Analytical!

Sincerely,

Michael Dee

Sr. Chemist / Principal

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# Hydrocarbon Identification in Solids by NWTPH-HCID

Project: Nuprecon - Point Ruston Concrete SP

Client: EMS

Client Project #: N/A

Lab Project #: CHM081217-1

									Duplicate
NWTPH-HCID	MRL	Method	RL		•	Composite			Composite
(mg/kg)		Blank		S1-121708	S2-121708	S3-121708	S4-121708	S5-121708	
Date Extracted		12/17/08		***	-	12/17/08			12/17/08
Date Analyzed		12/17/08				12/17/08			12/17/08
Matrix						Solid			Solid
						AP TOOL	,		
Gasoline	20	nd	100		All and a second	nd			nd
Mineral Spirts	30	nd	150			nd			nd
Kerosene	50	- nd	250			🚜 nd			nd
Diesel (Fuel Oil)	50	nd	250			nd nd			nd
Mineral Oil	100	nd	500			nd			nd
Heavy Oil	100	nd	500			nd	-		nd
·									
Surrogate Recovery		·-		12.		en -			
(Surr 1) 2-Fluorobiphenyl		80%	erit.	den.		102%	•		95%
(Surr 2) o-Terphenol		81%				100%			99%

<sup>&</sup>quot;nd" Indicates not detected at listed reporting limits

Acceptable Recovery Limits: Surrogate = 65% to 135%

<sup>&</sup>quot;int" Indicates that interference prevents determination

<sup>&</sup>quot;D" Indicates detection at or above the listed reporting limit

<sup>&</sup>quot;C" Indicates coelution prevents determination

<sup>&</sup>quot;MRL" Indicates Method Reporting Limit

<sup>&</sup>quot;RL" Indicates Reporting Limit



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# Analysis of Total Metals in Solids by EPA Method 6020

**Project: Nuprecon - Point Ruston Concrete SP** 

Client: EMS

Client Project #: N/A

Lab Project #: CHM081217-1

EPA 6020	MRL	Method	LCS	RL	•		Composite		
(mg/kg)		Blank			S1-121708	S2-121708	S3-121708	S4-121708	S5-121708
Date Extracted		12/17/08	12/17/08				12/17/08		
Date Analyzed		12/18/08	12/18/08			ožina.	12/18/08		
Matrix				·			Solid		
<del>.</del>	, w				, ac				
Arsenic (As)	1.0	nd	109%	5.0	4		40		
Lead (Pb)	1.0	nd	100%	5.0			25		

"nd" Indicates no detection at the listed reporting limits

"int" Indicates that interference prevents determination

"J" Indicates estimated value

"MRL" Indicates Method Reporting Limit

"RL" Indicates Reporting Limit

"LCS" Indicates Laboratory Control Sample

"MS" Indicates Matrix Spike

"MSD" Indicates Matrix Spike Duplicate
"RPD" Indicates Relative Percent Difference

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Acceptable RPD is determined to be less than 30% Acceptable Recovery Limits:

LCS, LCSD, MS, MSD: 65% to 135% Spike Concentration:

As = 60 mg/kg

Pb = 30 mg/kg



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# Analysis of Total Metals in Solids by EPA Method 6020

Project: Nuprecon - Point Ruston Co

Client: EMS

Client Project #: N/A

Lab Project #: CHM081217-1

		Duplicate		MS	MSD	
EPA 6020 (mg/kg)	MRL RL	Composite	RPD	Composite	Composite	RPD
Date Extracted		12/17/08	%	12/17/08	12/17/08	%
Date Analyzed		12/18/08		12/18/08	12/ <u>18/</u> 08	
Matrix		Solid		Solid	12/1 <i>8/</i> 08 _Solid	
Arsenic (As)	1.0 5.0	26	42%	104% 💰	109%	5%
Lead (Pb)	1.0 5.0	16	44%	65%	70%	7%

"nd" Indicates no detection at the listed reporting limits

"int" Indicates that interference prevents determination

"J" Indicates estimated value

"MRL" Indicates Method Reporting Limit

"RL" Indicates Reporting Limit

"LCS" Indicates Laboratory Control Sample

"MS" Indicates Matrix Spike

"MSD" Indicates Matrix Spike Duplicate "RPD" Indicates Relative Percent Difference

Acceptable RPD is determined to be less than 30%

Acceptable Recovery Limits:

LCS, LCSD, MS, MSD: 65% to 135%

Spike Concentration: \*

As = 60 mg/kg

Pb = 30 mg/kg



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# Analysis of PCB's (Polychlorinated Biphenyls) by EPA 8082

**Project: Nuprecon - Point Ruston Concrete SP** 

Client: EMS

Client Project #: N/A

Lab Project #: CHM081218-1

EPA 8082	MRL	Method	LCS	RL		Com	posite	
(mg/kg)		Blank			S1-121708	S2-121708	S3-121708	S4-121708
Date Extracted		12/18/08	12/18/08			12/	18/08	
Date Analyzed		12/18/08	12/18/08			12/	18/08	
Matrix						<u>s</u>	olid ·	
					4			
Aroclor 1016	0.5	nd		2.0			nd	•
Aroclor 1221	0.5	nd		2,6			nd	
Aroclor 1232	0.5	nd		<sub>*</sub> 2.0	42		nd .	
Aroclor 1242	0.5	nd		2.0		1	nd	
Aroclor 1248	0.5	nd	94%	2.0			nd	
Aroclor 1254	0.5	nd	éir.	2.0		1	hd	
Aroclor 1260	0.5	nd .		2.0		:. · · · · · · · · · · · · · · · · · · ·	nd	
Surrogate Recovery	100	#4#2#a		15				
Surr 1 (TCMX)		92%	104%			1 '	17%	
Surr 2 (DCBP)		100%	109%	j.			int	

<sup>&</sup>quot;nd" Indicates no detection at the listed reporting limits

Acceptable RPD is determined to be less than 30% Acceptable Recovery Limits:

Surrogates = 65% to 135% LCS, LCSD, MS, MSD = 65% to 135%

Surrogates Concentration = 25 μg/L

Spike Concentration = 1.0 mg/kg

<sup>&</sup>quot;int" Indicates that interference prevents determination

<sup>&</sup>quot;C" Indicates coelution with Sample Peaks

<sup>&</sup>quot;J" Indicates estimated value

<sup>&</sup>quot;MRL" Indicates Method Reporting Limit

<sup>&</sup>quot;LCS" Indicates Laboratory Control Sample

<sup>&</sup>quot;MS" Indicates Matrix Spike

<sup>&</sup>quot;MSD" Indicates Matrix Spike Duplicate

<sup>&</sup>quot;RPD" Indicates Relative Percent Difference



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# Analysis of PCB's (Polychlorinated Biphenyls) by EPA 8082

Project: Nuprecon - Point Ruston Co

Client: EMS

Client Project #: N/A

Lab Project #: CHM081218-1

Lab / Toje ot #. Of the	001210-1							
				Duplicate		MS	MSD	
EPA 8082		MRL	RL	Composite	RPD	Composite	Composite	RPD
(mg/kg)								
Date Extracted				12/18/08	%	12/18/08	12/18/08	. %
Date Analyzed				12/18/08		12/18/08	<sup>#1</sup> 12/18/08	
Matrix	·			Solid		Solid	Solid	
							* 2000 V	
Aroclor 1016		0.5	2.0	nd				
Aroclor 1221		0.5	2.0	nd	, e			
Aroclor 1232		0.5	2.0	nd	4		14214	
Aroclor 1242		0.5	2.0	.nd				
Aroclor 1248		0.5	2.0	nd	•	72%	78%	8%
Aroclor 1254		0.5	2.0	nd∢∰	âla.			
Aroclor 1260		0.5	2.0	nd 🐘		t., 160		
•							•	
Surrogate Recovery	* 4,		.s.f	iiida (				
Surr 1 (TCMX)				123%	TAL.	118%	112%	,
Surr 2 (DCBP)	•	σÑ		int	70.00	107%	109%	
		***			gip-			

Acceptable RPD is determined to be less than 30%

Acceptable Recovery Limits:

Surrogates = 65% to 135%

LCS, LCSD, MS, MSD = 65% to 135%

Surrogates Concentration = 25 µg/L

Spike Concentration = 1.0 mg/kg

<sup>&</sup>quot;int" Indicates that interference prevents determination

<sup>&</sup>quot;C" Indicates coelution with Sample Peaks

<sup>&</sup>quot;J" Indicates estimated value

<sup>&</sup>quot;MRL" Indicates Method Reporting Limit

<sup>&</sup>quot;LCS" Indicates Laboratory Control Sample

<sup>&</sup>quot;MS" Indicates Matrix Spike

<sup>&</sup>quot;MSD" Indicates Matrix Spike Duplicate

<sup>&</sup>quot;RPD" Indicates Relative Percent Difference

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2930 Westlake Ave N Suite 100 Seattle, WA 98109 T: (206) 352-3790

F: (206) 352-7178

info@fremontanalytical.com

Environmental Management Services, LLC Attn: Steve Spencer
PO Box 153
652 8th Ave.
Fox Island, WA 98333

**RE: Point Ruston Sampling** 

Fremont Project No: CHM081219-2

December 22nd, 2008

#### Steve:

Enclosed are the analytical results for the **Point Ruston** samples delivered to Fremont Analytical on December 19th, 2008.

The samples were received in good condition - properly sealed, labeled and within holding time. The samples were contained in 4oz soil jars. The samples were composited, extracted, analyzed and then stored in a refrigeration unit at the USEPA-recommended temperature of 4°C ± 2°C.

Examination of these samples was conducted for the presence of the following:

• Total Metals (As) in Solids by EPA Method 6020

This application was performed under Washington State Department of Ecology accreditation parameters. All appropriate Quality Assurance / Quality Control method parameters have been applied.

Notations – EPA Method 6020: Only 3 of the 4 samples were used to create the composite sample. Sample S2A-121908 was not included as we were not able to break down the sample to create an equal part. In addition, we were not able to include a Matrix Spike (MS) or MS Duplicate as there was not enough of a uniform sample. The Laboratory Control Sample (LCS) was included to demonstrate that the analysis was in control.

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Please contact the laboratory if you should have any questions about the report.

Thank you for using Fremont Analytical!

Sincerely,

Michael Dee

Sr. Chemist / Principal

mikedee@fremontanalytical.com

www.fremontanalytical.com



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# Analysis of Total Metals in Solids by EPA Method 6020

**Project: Point Ruston Sampling** 

Client: EMS

Client Project #: N/A

Lab Project #: CHM081219-2

		<u> </u>						Duplicate	
EPA 6020 (mg/kg)	MRL	Method Blank	LCS	RL	S2-121908	Composite S2B-121908	S2C-121908	Composite	RPD
Date Extracted		12/22/08	12/22/08			12/22/08	•	12/22/08	%
Date Analyzed Matrix		12/22/08	12/22/08			12/22/08 Solid		12/22/08 Solid	
Arsenic (As)	1.0	nd	103%	3.0		50		47	6%

<sup>&</sup>quot;nd" Indicates no detection at the listed reporting limits

Acceptable RPD is determined to be less than 30%

Acceptable Recovery Limits:
LCS, LCSD, MS, MSD: 65% to 135%

Spike Concentration:

As = 60 mg/kg



www.fremontanalytical.com

<sup>&</sup>quot;int" Indicates that interference prevents determination

<sup>&</sup>quot;J" Indicates estimated value

<sup>&</sup>quot;MRL" Indicates Method Reporting Limit

<sup>&</sup>quot;RL" Indicates Reporting Limit

<sup>&</sup>quot;LCS" Indicates Laboratory Co

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info@fremontanalytical.com

Environmental Management Services, LLC Attn: Steve Spencer
PO Box 153
652 8th Ave.
Fox Island, WA 98333

RE: Point Ruston

Fremont Project No: CHM081229-2

December 30th, 2008

#### Steve:

Enclosed are the analytical results for the **Hoint Ruston** samples delivered to Fremont Analytical on December 29th, 2008.

The samples were received in good condition- properly sealed, labeled and within holding time. The samples were contained in 4oz sample jars. The samples were extracted, analyzed and then stored in a refrigeration unit at the USEPA-recommended temperature of  $4^{\circ}\text{C} \pm 2^{\circ}\text{C}$ .

Examination of these samples was conducted for the presence of the following:

• Total Metals (As) in Solids by EPA Method 6020

This application was performed under Washington State Department of Ecology accreditation parameters. All appropriate Quality Assurance / Quality Control method parameters have been applied.

Please contact the laboratory if you should have any questions about the report.

Thank you for using Fremont Analytical!

Sincerely,

Michelle Clements
Lab Manager / Sr. Chemist

mclements@fremontanalytical.com



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email: info@fremontanalytical.com

# Analysis of Total Metals in Solids by EPA Method 6020

**Project: Point Ruston** 

Client: EMS

Client Project #: N/A

Lab Project #: CHM081229-2

					Duplicate		
EPA 6020 (mg/kg)	MRL	Method Blank	LCS	S5-122308	S5-122308	RPD	S6-122308
Date Extracted		12/30/08	12/30/08	12/30/08	12/30/08	%	12/30/08
Date Analyzed		12/30/08	12/30/08	12/30/08	12/30/08		12/30/08
Matrix	<u> </u>			Concrete	Concrete		Concrete
Arsenic (As)	1.0	nd	105%	55	46	18%	5.9

<sup>&</sup>quot;nd" Indicates no detection at the listed reporting limits

Acceptable RPD is determined to be less than 30% Acceptable Recovery Limits:

LCS, LCSD, MS, MSD: 65% to 135%

Spike Concentration:

As = 60 mg/kg

<sup>&</sup>quot;int" Indicates that interference prevents determination

<sup>&</sup>quot;J" Indicates estimated value

<sup>&</sup>quot;MRL" Indicates Method Reporting Limit

<sup>&</sup>quot;LCS" Indicates Laboratory Control Sample

<sup>&</sup>quot;MS" Indicates Matrix Spike

<sup>&</sup>quot;MSD" Indicates Matrix Spike Duplicate

<sup>&</sup>quot;RPD" Indicates Relative Percent Difference



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# Analysis of Total Metals in Solids by EPA Method 6020

**Project: Point Ruston** 

Client: EMS

Client Project #: N/A

Lab Project #: CHM081229-2

				MS	MSD	
EPA 6020 (mg/kg)	MRL	C1-POST	C2-PRE	S5-122308	S5-122308	RPD
Date Extracted		12/30/08	12/30/08	12/30/08	12/30/08	%
Date Analyzed		12/30/08	12/30/08	12/30/08	12/30/08	
Matrix		Concrete	Concrete	Concrete	Concrete	
Arsenic (As)	1.0	20	43	104%	82%	24%

<sup>&</sup>quot;nd" Indicates no detection at the listed reporting limits

Acceptable RPD is determined to be less than 30% Acceptable Recovery Limits:

LCS, LCSD, MS, MSD: 65% to 135%

Spike Concentration:

As = 60 mg/kg

<sup>&</sup>quot;int" Indicates that interference prevents determination

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<sup>&</sup>quot;MRL" Indicates Method Reporting Limit

<sup>&</sup>quot;LCS" Indicates Laboratory Control Sample

<sup>&</sup>quot;MS" Indicates Matrix Spike

<sup>&</sup>quot;MSD" Indicates Matrix Spike Duplicate

<sup>&</sup>quot;RPD" Indicates Relative Percent Difference

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#### **ENVIRONMENTAL CHEMISTS**

James E. Bruya, Ph.D. Charlene Morrow, M.S. Yelena Aravkina, M.S. Bradley T. Benson, B.S. Kurt Johnson, B.S. 3012 16th Avenue West Seattle, WA 98119-2029 TEL: (206) 285-8282 FAX: (206) 283-5044 e-mail: fbi@isomedia.com

January 7, 2009

Steve Spencer, Project Manager Environmental Management Services, LLC PO Box 153 Fox Island, WA 98333

Dear Mr. Spencer:

Included are the results from the testing of material submitted on January 5, 2009 from the Point Ruston, F&BI 901010 project. There are 6 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions

Sincerely,

FRIEDMAN & BRUYA, DNC.

Michael Erdahl Project Manager

Enclosures EMS0107R.DOC

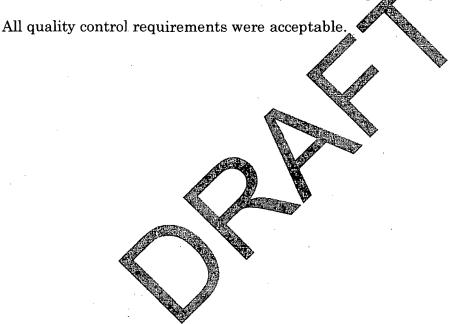
### **ENVIRONMENTAL CHEMISTS**

### CASE NARRATIVE

This case narrative encompasses samples received on January 5, 2008 by Friedman & Bruya, Inc. from the Environmental Management Services Point Ruston, F&BI 901010 project. Samples were logged in under the laboratory ID's listed below.

<u>Laboratory ID</u> <u>Environmental Management Services</u> 901010-01 D-C1-Post 901010-02 D-C2-Pre

The samples were sent to NVL for arsenic analysis by atomic absorption. The report generated by NVL will be forwarded to your office upon eccipt.



### **ENVIRONMENTAL CHEMISTS**

# Analysis For Total Metals By EPA Method 200.8

Client ID: Date Received: D-C1-Post

Date Extracted: Date Analyzed:

Matrix: Units:

01/05/09 01/05/09

mg/kg (ppm)

01/05/09

Soil

Client:

Environmental Management Services Point Ruston, F&BI 901010

Project: Lab ID: Data File:

901010-01 901010-01.010

Instrument: ICPMS1

Operator: hr

Lower Limit:

Upper Limit:

Internal Standard:

Indium

% Recovery:

103

Concentration

mg/kg (ppm)

60

125

Analyte:

Arsenic

40.1

### **ENVIRONMENTAL CHEMISTS**

# Analysis For Total Metals By EPA Method 200.8

Client ID:

D-C2-Pre

Client: Project: **Environmental Management Services** 

Date Received: Date Extracted:

01/05/09 01/05/09

Lab ID:

Point Ruston, F&BI 901010

Date Analyzed:

01/05/09

Data File:

901010-02 901010-02.011

Matrix:

Soil

Instrument: ICPMS1

Units:

mg/kg (ppm)

Operator:

hr

Internal Standard:

% Recovery:

Lower Limit: Upper Limit:

Indium

99

60

125

Analyte:

Concentration mg/kg (ppm)

Arsenic

12.5

### **ENVIRONMENTAL CHEMISTS**

# Analysis For Total Metals By EPA Method 200.8

Client ID:

Method Blank

Client: Project: Not Applicable

**Environmental Management Services** 

Date Received: Date Extracted:

01/05/09

Lab ID:

Point Ruston, F&BI 901010 I9-002 mb

Date Analyzed: Matrix:

01/05/09 Soil

Data File: Instrument: ICPMS1

I9-002 mb.008

hr

Units:

mg/kg (ppm)

Operator:

Internal Standard:

% Recovery:

Lower Limit: Upper Limit:

Indium

102

60

125

Analyte:

Concentration mg/kg (ppm)

Arsenic

<1

### **ENVIRONMENTAL CHEMISTS**

Date of Report: 01/07/09 Date Received: 01/05/09

Project: Point Ruston, F&BI 901010

# QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR TOTAL METALS USING EPA METHOD 200.8

Laboratory Code: 901007-01 (Duplicate) Relative Duplicate Sample Percent Acceptance Difference Reporting Units Result Result Criteria Analyte mg/kg (ppm) 28.7 36.9 25 hr 0-20 Arsenic Laboratory Code: 901007-01 (Matrix Spike) Percent Samp Recovery Spike Acceptance Reporting Units MS Level Result Criteria Analyte 10 28.7 167 b 50-150 Arsenic mg/kg (ppm) Laboratory Code: Laboratory Control Sample Percent Acceptance Recovery Reporting Uni LCS Criteria Analyte 102 70-130 Arsenic mg/kg (ppm)

### **ENVIRONMENTAL CHEMISTS**

# **Data Qualifiers & Definitions**

- a The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.
- A1 More than one compound of similar molecule structure was identified with equal probablility.
- b The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.
- ca The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.
- c The presence of the analyte indicated may be due to carryover from previous sample injections.
- d The sample was diluted. Detection limits may be raised due to dilution.
- ds The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.
- dv Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.
- fb The analyte indicated was found in the method blank. The result should be considered an estimate.
- fc The compound is a common laboratory and field contaminant.
- hr The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. The variability is attributed to sample intomogeneity.
- ht The sample was extracted outside of holding time. Results should be considered estimates.
- ip Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.
- j The result is below normal reporting limits. The value reported is an estimate.
- J The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.
- jl The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.
- ir The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.
- js The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.
- lc The presence of the compound indicated is likely due to laboratory contamination.
- L The reported concentration was generated from a library search.
- nm The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.
- pc The sample was received in a container not approved by the method. The value reported should be considered an estimate.
- pr The sample was received with incorrect preservation. The value reported should be considered an estimate
- ve The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.
- vo The value reported fell outside the control limits established for this analyte.
- x The pattern of peaks present is not indicative of diesel.
- y The pattern of peaks present is not indicative of motor oil.

SAMPLE CHAIN OF CUSTODY

ME 1/5/09 AT,

SAMPLERS (signature) Send Report To PROJECT NAME/NO. PO# Company: EMS Point Ruston Address: PO Box 153 REMARKS City, State, ZIP: Fox Island, WA 98333 ASAP RUSH ANALYSIS Phone #: 253-238-9270 E-Mail: sspencer@emsgroupllc.com

TURNAROUND TIME Standard (2 Weeks) Rush charges authorized by: SAMPLE DISPOSAL □ Dispose after 30 days

☐ Return samples

☐ Will call with instructions

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Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of containers	TPH-Diesel	TPH-Gasoline	BTEX by 8021B	VOCs by 8260	SVOCs by 8270	HFS	Assemic	As b. Flyn AA	-			Notes	
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Friedman & Bruya, Inc. 3012 16th Avenue West

Seattle, WA 98119-2029

Ph. (206) 285-8282

Fax (206) 283-5044

FORMS\COC\COC.DOC

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